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March 15, 2022

Michael E. Gans, Clerk
United States Court of Appeals for the Eighth Circuit
Thomas F. Eagleton Courthouse
Room 24.329
111 South 10th Street
St. Louis, MO 63102

Re: George Kelly III, et al. v. The Aliera Companies, Inc., No. 20-3702

Dear Mr. Gans:

On behalf of appellant The Aliera Companies, Inc., I am writing in response to the Court's Order dated December 15, 2021, staying this matter pursuant to the provisions of 11 U.S.C. § 362 and requiring regular status reports beginning 90 days from the date of the Order. In addition to the petition for involuntary bankruptcy referenced in the Court's Order, Aliera filed a voluntary Chapter 11 petition in the Bankruptcy Court for the Northern District of Georgia on December 21, 2021, Case No. 23-59493-JRS. That voluntary bankruptcy case—together with the separate cases of four affiliates—has since been transferred and consolidated for joint administration with the involuntary bankruptcy in the Bankruptcy Court for the District of Delaware, Case No. 21-11548-JTD.

Aliera is represented in its bankruptcy proceedings by the firm of Scroggins & Williamson, P.C., 4401 Northside Parkway Ste 450, Atlanta, GA 30327. The undersigned is informed by Aliera's bankruptcy counsel that, due to the consolidation of multiple cases and the complexity of the issues, the jointly administered bankruptcy is in its initial stages and is not expected to be resolved for some time. Appellant accordingly requests that the Court maintain its stay with status reports continuing at 90-day intervals. Please do not hesitate to let me know if the Court desires any further information.

Respectfully,

Joshua B. Christensen

Counsel for Appellant The Aliera Companies, Inc.

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